Magistrate Judge Michelle L. Peterson 1 2 3 4 5 6 UNITED STATES DISTRICT COURT FOR THE 7 WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 10 UNITED STATES OF AMERICA, CASE NO. MJ24-068 11 Plaintiff 12 COMPLAINT for VIOLATION 13 v. 14 RODERICK HISOLA WHITT, Title 18 U.S.C. § 871 15 Defendant. 16 17 18 19 BEFORE, Michelle L. Peterson, United States Magistrate Judge, U. S. 20 Courthouse, Seattle, Washington. 21 The undersigned, Jacob Nelson, complainant being duly sworn states: 22 **COUNT ONE** 23 (Threat towards the President of the United States) 24 On or about January 11, 2024, in King County, within the Western District of Washington, RODERICK HISOLA WHITT did knowingly and willfully make a threat to 25 26 take the life of and to inflict bodily harm upon the President of the United States. 27

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1	Specifically, the defendant stated in part, "Yea its RODERICK HISOLA WHITT. The
2	real second. I'm here in Seattle [inaudible] I'ma come over there and I'm going to hunt
3	down Joe Biden and Kevin McCarthy and I'm going to fucking kill them. RODERICK
4	HISOLA WHITT. Death threats towards the President, Politicians, always. Until the day
5	I die and ascend. I hope you're understanding me. I hope you get this message.
6	RODERICK HISOLA WHITT. I am your worst fucking nightmare. I'm your biggest
7	threat. Kill me and find out."
8	All in violation of Title 18, United States Code Section 871.
9	And the complainant states that this Complaint is based on the following
10	information:
11	I, Jacob Nelson, being first duly sworn on oath, depose and say:
12	1. I am an investigative law enforcement officer of the United States within
13	the meaning of 18 U.S.C. § 2510(7). As such, I am empowered to conduct investigations
14	of, and to make arrests for, violations of Title 18, United States Code, Section 871, and
15	related offenses. I am employed as a Special Agent with the United States Secret Service
16	(USSS) and have been so employed since September 2022. I am currently assigned to the
17	Seattle Field Office – General Investigations Squad. Some of my duties include, but are
18	not limited to, investigating threats towards the President and Vice President of the
19	United States (POTUS and VPOTUS). I have received training in investigations and
20	federal law enforcement from the Federal Law Enforcement Training Center (FLETC)
21	and Rowley Training Center (RTC) and am a graduate of the Special Agent Training
22	program. Prior to my current assignment, I was an Infantry Officer in the United States
23	Army for four years.
24	2. The information contained in this Criminal Complaint is based on my
25	personal
26	knowledge, training, experience, and investigation as well as information relayed to me

27 || by other law enforcement agents involved in this investigation. I have not included in this

Criminal Complaint every fact known to me or to other law enforcement officers 2 surrounding this investigation. Rather, I have included only those facts necessary to establish probable cause that RODERICK HISOLA WHITT committed the offense 3 4 alleged in this complaint. 5 SUMMARY OF PROBABLE CAUSE 3. On or about January 11, 2024, at approximately 02:21:50 EDT with a call 6 duration of 44 seconds, RODERICK HISOLA WHITT left the following voicemail 7 message on USCP's Threats Main Line number 202-224-1495: 8 "Yea its RODERICK HISOLA WHITT. The real second. I'm here in 9 Seattle [inaudible] I'ma come over there and I'm going to hunt down Joe Biden and Kevin McCarthy and I'm going to fucking kill them. 10 RODERICK HISOLA WHITT. Death threats towards the President, 11 Politicians, always. Until the day I die and ascend. I hope you're understanding me. I hope you get this message. RODERICK HISOLA 12 WHITT. I am your worst fucking nightmare. I'm your biggest threat. Kill 13 me and find out." The number WHITT called USCP from was 206-990-4334, a T-Mobile phone number; 14 the basic subscriber info released from T-Mobile shows 206-990-4334 is used by 15 16 Roderick WHITT. The address listed on the subscriber information is 2720 E Madison St, Seattle, WA 98112-4739, the address being Bailey-Boushay House, an assisted living 17 18 facility where WHITT has previously been a patient. The T-Mobile number 206-990-19 4334 is currently being used by WHITT to text Assistant Special Agent in Charge 20 (ASAIC) Trent Heinrichs (Heinrichs) as discussed further below. 21 4. WHITT first came to the attention of the USSS on May 26, 2022, when 22 WHITT called the FBI National Threat Operations Center (NTOC) insisting he was 23 going to Washington, D.C. to speak with the President of the United States. At the time, 24 WHITT's listed address was 2720 E Madison St, Seattle, WA 98112-4739. WHITT claimed his family had been negatively affected by their drug dealings with Hunter 25 26

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Biden, the President's son¹. On June 10, 2022, Senior Special Agent (SSA) Mike Spiess of the USSS conducts a voluntary interview with WHITT. WHITT was located at 4219 S. Othello Street, Apt. 625, Seattle, WA, and displayed signs of delusion by claiming he had knowledge of high-level government executives involved in drug activities. WHITT added that unidentified Chinese individuals were targeting him and his mother for retribution because of their knowledge of those activities. WHITT also claimed he called the FBI after he read Hunter Biden's book recounting the 1972 fatal car accident involving the Biden family. WHITT added that his aunt also died in a car accident that same year and was convinced the two accidents were in fact the same one. WHITT said he planned to move to his hometown Twisp, WA to ensure his mother did not get arrested. During this interview, WHITT denied any intention to harm the President of the United States or any other individual protected by the USSS.² WHITT called the USSS – Seattle Field Office multiple times that same day. Approximately two weeks later, WHITT walked into the USSS – Seattle Office, claiming he had an appointment with the agent who previously interviewed him on June 10, 2022. WHITT did not have an appointment and was asked to leave the office.

5. On July 8, 2022, WHITT called the USSS – Seattle Field Office again, this time saying he planned to travel to Washington, D.C., to sue Hunter Biden. Approximately a month later, WHITT was detained by Amtrak Police in Washington, D.C.'s Union Station for disorderly conduct. AMTRAK officers and customers reported that WHITT claimed he was "the second coming of Christ," and stating "it was Barack Obama's fault." After instructing WHITT to cease the harassment, Officer Fales and Sergeant Davison, the responding officers, witnessed WHITT tell a female patron of AMTRAK to "get the fuck away from me, or else," noting WHITT was

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¹ There is no evidence or indication that this statement is true.

² These claims were not able to be verified due to the consensual nature of the interview and inability to conduct investigatory search.

acting very erratic and continuing to talk to himself and walk around in circles. Based on WHITT's comments, behaviors, and actions, Officer Fales and Sergeant Davison decided that WHITT needed a mental health evaluation. WHITT was compliant when asked to place his hands behind his back and was taken into custody with no incident. The AMTRAK officers took WHITT to Washington Hospital Center to be admitted to a psychological unit for further mental evaluation where WHITT made statements about Hunter Biden being "a crack addict".

- 6. On August 8, 2022, just a couple days after his psychological evaluation at Washington Hospital Center, WHITT entered the commercial lobby of Trump Tower in Manhattan and asked to speak with former President Donald Trump. WHITT claimed he had family connections to the drug trade and money laundering that who provided WHITT with information about Hunter Biden and President Biden's family. WHITT explained that he wanted to give this information to former President Trump to assist former President Trump in his next campaign. WHITT claimed his family helped the Biden family pay a debt stemming from the Biden family fatal car crash in 1972. He repeated that his family's ties to the drug trade were linked to Hunter Biden and drug addiction issues in Washington, D.C. WHITT stated that the 2020 Presidential election was rigged due to former President Trump combatting the drug crisis. He expressed his desire to meet with former President Trump and an attorney so that he could sue Hunter Biden for the mental anguish he had caused to WHITT's family.
- 7. On August 17, 2022, the US Capitol Police reported WHITT left a voicemail for Representative Kathleen Rice (NY) in which WHITT stated he was going to "get her."
- 8. Between September 1, 2022, and September 11, 2022, WHITT left three voicemails for United States Senator Maria Cantwell making references toward President Biden, former President Trump, and Hunter Biden. WHITT referenced the fatal Biden family 1972 car crash and wanting to "haul their [President Biden and Hunter Biden]

asses to court" and to bring criminal charges against them. He also spoke about "barging through the fucking White House" to "grab him [President Biden] by his fucking shriveled up fucking testicles and fucking yard him out there to fucking Pennsylvania Avenue...."

- 9. On September 13, 2022, WHITT walked into the USSS - Seattle field office again, unannounced, and asked to speak to "Agent Mike," the USSS SSA who conducted WHITT's interview on June 10, 2022. When WHITT was told SSA Mike Spiess was not available, WHITT stated that he could only talk to "Agent Mike." WHITT then stated he was going to travel to Washington, D.C. When asked why he wanted to travel to Washington D.C., WHITT stated, "Because I'm a U.S. Citizen" before departing the office.
- 10. On January 10, 2023, WHITT called USCP to inform them he was at a hotel in Arlington, VA, and planned on traveling to Washington, D.C. The next day, two Protective Intelligence agents with USSS out of the Washington D.C. field office met with WHITT for a consensual interview, which was conducted at WHITT's hotel in Arlington, VA. WHITT stated he was a descendant of Jesus and believed the President of the United States was after him. He expressed his goal was to get President Biden arrested and asked if local police would arrest President Biden or Congress. A review of WHITT's Facebook account revealed a video posted the same day about religious conspiracies, First Lady Jill Biden, and referred to President Biden as "a fucking fossil." WHITT said he traveled to Washington, D.C., to resolve the issues going on in Seattle, WA, claiming Hunter Biden was stalking him due to the information WHITT possessed regarding Hunter Biden's alleged drug use. WHITT felt anything regarding the "Commander in Chief" was important and advised that "Agent Mike" had dismissed his concerns. WHITT believed Hunter Biden was stalking him and felt the death of his aunt was detailed in Hunter Biden's book. He also made several nonsensical statements about 27 || religion.

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- 12. On January 23, 2023, at approximately 8:28 AM EST, the USCP Threat Assessment Section (TAS) received a call on 202-224-1495. The caller identification displayed the incoming number as 206-990-4334, owned by WHITT. Special Agent Joshua Bank with USCP answered the phone and WHITT stated, "I am going to kill Joe Biden", and concluded with "you better surround that mother fucker like the Alamo" before WHITT abruptly hung up the phone.
- 13. On January 25, 2023, and January 26, 2023, Congressman Adam Smith's (WA) office staff reported that WHITT made a hostile and threatening call from phone 206-990-4334 stating "I [WHITT] will fly to DC and strangle the Biden family. Adam Smith needs to watch out, as does this office, as I will be coming there first." He also stated: "Biden is going to be killed...do it now do it now."
- 14. On January 29, 2023, WHITT posted a one minute and five second video 27 on his Facebook page stating he planned on visiting Washington, D.C., in March 2023

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and would penetrate the White House by any means, up to and including his death, to "wring" President Biden's neck. WHITT made these statements in an excited, loud manner often shouting at the camera about his intent. WHITT claimed that to stop him [WHITT]: "you are going to have to fucking kill me." It is unknown whether WHITT traveled to DC in March of 2023.

- 15. On January 30, 2023, USCP reported that WHITT placed a rambling call to the office of a US Representative regarding his belief of his family's crash along with the Bidens, grandiose delusions of him [WHITT] being "the one" [reference to being the second coming of Jesus Christ], and expressed his resolution to travel to Washington, D.C.
- 16. On October 8, 2023, USCP reported that WHITT made a number of phone calls to the USCP Command Center, one of which contained a threat to kill President Biden, "I'm going to kill President Joe Biden. I'm from Seattle, Washington. You have no idea what's coming". Two days later, WHITT made more threatening statements. Congressional staffers reported WHITT called and stated that "he [WHITT] had been assaulted and would be coming to Washington D.C. to kill Joe Biden." WHITT was called by ASAIC Heinrichs and WHITT invited ASAIC Heinrichs and SA Sidney McKee of the USSS to his current residence at 201 Yesler Way Apt 603 Seattle, WA 98104 for an interview. At the interview, WHITT stated he was a direct descendant of Jesus Christ and "I [WHITT] is the second coming." WHITT claimed he wanted to get the attention of the USSS and to share his message with the US government that he is in fact the second coming. WHITT claimed that the threat towards President Biden was solely made to gain the attention of the USSS and made a written statement detailing that WHITT does not intend to harm anyone and will no longer call the government. During the interview, ASAIC Heinrichs and SA McKee observed a photograph of Hunter Biden being displayed next to his culinary knives placed upon his apartment's windowsill. WHITT explained to ASAIC Heinrichs and SA McKee that he believed the car crash that

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killed his aunt and Hunter Biden's mother are related. WHITT's former care manager, Lauren Solares, of the Bailey-Boushay house, detailed that WHITT gets fixated on things easily and his delusions are baseline behavior.

- 17. On January 15, 2024, ASAIC Heinrichs of the USSS Seattle Field Office attempted to interview WHITT at his residence after WHITT had left a voicemail on January 11, 2024, threatening to kill President Joe Biden and Kevin McCarthy as mentioned in paragraph 3 above. WHITT told investigators to "Fuck off. I [WHITT] do not want to speak with you anymore. I am going to Washington, DC."
- 18. From January 15, 2024, to present, WHITT has sent approximately 200 recordings of himself via text message to ASAIC Heinrichs, of USSS Seattle, reiterating his belief he is the "second coming" and will soon die and ascend to heaven.
- 19. On January 31, 2024, WHITT sent ASAIC Heinrichs a fifty-four second video clip where he appears to be agitated and angry as he makes claims that he wants to die and that he wants someone to kill him. WHITT then goes on to state, "I'm [WHITT] going to kill Joe Biden, what are you going to do..."





Screenshots of January 31, 2024, video sent to ASAIC Heinrichs

19. On December 16, 2016, WHITT was charged with an Ordinance violation by the Rockford Police Department in Rockford Illinois and on May 25, 2017, a non-

extraditable warrant was issued for failure to appear in Winnebago County State 2 Attorney's Office. 3 **CONCLUSION** 20. 4 Based on the above facts, I respectfully submit that there is probable cause 5 to believe that RODERICK HISOLA WHITT did knowingly and willfully make a threat to take the life of, to kidnap, and to inflict bodily harm upon the President of the United 6 States, in violation of Title 18, United States Code, 871. 7 8 This complaint and affidavit are being submitted via reliable electronic 21. means. Fed R. Crim. P. 4.1 & 41(d)(3). 9 10 11 Jacob Nelson, Complainant Special Agent, United States Secret 12 Service 13 14 The above-named agent provided a sworn statement attesting to the truth of the 15 contents of the foregoing affidavit by telephone. Based on the Complaint and Affidavit 16 sworn to before me, the Court hereby finds that there is probable cause to believe the 17 Defendant committed the offense set forth in the Complaint. 18 Dated this ______ day of February, 2024. 19 20 The Honorable Michelle L. Peterson 21 United States Magistrate Judge 22 23 24 25 26 27